

EXHIBIT G

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL)
5 PRESCRIPTION) MDL No. 2804
6 OPIATE LITIGATION)
7 _____) Case No.
8) 1:17-MD-2804
9)
10 THIS DOCUMENT RELATES) Hon. Dan A.
11 TO ALL CASES) Polster
12)

13 FRIDAY, JANUARY 4, 2019

14 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
15 CONFIDENTIALITY REVIEW

16 - - -

17 Videotaped deposition of Ramona
18 Sullins, held at the offices of JONES DAY, 77
19 West Wacker Drive, Chicago, Illinois,
20 commencing at 7:31 a.m., on the above date,
21 before Carrie A. Campbell, Registered
22 Diplomate Reporter, Certified Realtime
23 Reporter, Illinois, California & Texas
24 Certified Shorthand Reporter, Missouri &
25 Kansas Certified Court Reporter.

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1 RAMONA SULLINS,
2 of lawful age, having been first duly sworn
3 to tell the truth, the whole truth and
4 nothing but the truth, deposes and says on
5 behalf of the Plaintiffs, as follows:

6
7 VIDEOGRAPHER: Please proceed.

8
9 DIRECT EXAMINATION
10 QUESTIONS BY MR. BOWER:

11 Q. Good morning, Ms. Sullins. How
12 are you today?

13 A. Doing good, thank you.

14 Q. Have you ever given a
15 deposition before?

16 A. No.

17 Q. So I'm sure your attorney
18 informed you of kind of the ground rules for
19 today, but we'll go over a few of the
20 important ones, okay, and let me know if you
21 don't understand any.

22 Okay?

23 A. Okay.

24 Q. The first and probably most
25 important is just to let me finish my

1 Q. When did you graduate high
2 school?

3 A. 1987.

4 Q. So you went to work for Walmart
5 after graduating high school; is that
6 correct?

7 A. Correct.

8 Q. What was your first job at
9 Walmart?

10 A. I was an order filler.

11 Q. And where was -- where were you
12 located at that time?

13 A. Plainview, Texas.

14 Q. And how long did you -- strike
15 that.

16 What was your next job at
17 Walmart after an order filler?

18 A. I loaded trailers.

19 Q. What do you mean by "loaded
20 trailers"?

21 A. I physically loaded
22 televisions, dog food, paint, into a trailer,
23 floor-loaded it.

24 Q. Was that at a Walmart
25 distribution center?

1 Q. And then what was the change in
2 2008?

3 A. I moved over to the pharmacy.

4 Q. And what was your title in
5 2008?

6 A. I was senior manager on the
7 pharmacy team.

8 Q. Was that your title in 2008,
9 senior manager in the pharmacy team?

10 A. I don't know what it said.

11 Q. What were your duties and
12 responsibilities in connection with that
13 role?

14 A. So I had responsibility to
15 bring in a system because they were filling
16 orders with pen and paper, and just
17 day-to-day operational questions that would
18 come up.

19 Q. Were you assigned -- strike
20 that.

21 Was that position at the home
22 office?

23 A. Yes, but it was still under
24 logistics.

25 Q. What do you mean by that, by

1 the statement that it was still under
2 logistics?

3 A. It is under the division of
4 logistics.

5 Q. Was that division at the home
6 office?

7 A. Yes.

8 Q. When you say that you were --
9 one of your duties was to bring in a system
10 because they were currently filling orders
11 with pen and paper, what do you mean by that?

12 A. So they would get a document
13 for orders, and they would go fill those
14 store orders based on the paper document.

15 Q. So who would get the document?

16 A. So the distribution center
17 would, and they would pass those documents
18 out to the order fillers.

19 Q. At that point in 2008, had you
20 received any training specific to pharmacy?

21 A. I did. I went to the
22 distribution centers.

23 Q. So at some point in or about
24 2008 you traveled to the distribution
25 centers; is that correct?

1 was implemented in 6045, but we started the
2 project in 2009.

3 Q. Do you know whether the
4 implementation of Reddwerks impacted
5 Walmart's suspicious order monitoring program
6 at all?

7 MS. FUMERTON: Objection.

8 Form.

9 THE WITNESS: I have no idea.

10 QUESTIONS BY MR. BOWER:

11 Q. You don't know one way or the
12 other, correct?

13 A. I have no idea.

14 MS. FUMERTON: Zach, we've been
15 going for about an hour. Would it be
16 okay --

17 MR. BOWER: Can we just have a
18 few minutes just to round out her
19 employment history and then we'll --

20 MS. FUMERTON: Sure.

21 MR. BOWER: I just wanted -- so
22 we can switch topics after the break.

23 QUESTIONS BY MR. BOWER:

24 Q. So you held this position
25 beginning in 2008 where you were senior

1 manager for the pharmacy team.

2 How long did you hold that
3 position?

4 A. That's what I currently do.

5 Q. You still have that -- what's
6 your current title?

7 A. Senior manager, department
8 supply chain. We just changed it from
9 logistics to supply chain.

10 MR. BOWER: It might take a
11 little longer to go through subsequent
12 duties and responsibilities, so why
13 don't we take a break and we can
14 finish up after.

15 MS. FUMERTON: Okay.

16 VIDEOGRAPHER: Going off the
17 record at 8:33 a.m.

18 (Off the record at 8:33 a.m.)

19 VIDEOGRAPHER: We're back on
20 the record at 8:47 a.m.

21 QUESTIONS BY MR. BOWER:

22 Q. Okay. I just want to finish
23 up, hopefully fairly briefly, your roles at
24 Walmart.

25 So from 2008 to the present,

1 office.

2 Q. Do you know what ARCOS is?

3 A. Yes.

4 Q. What is ARCOS?

5 A. Sales and purchases.

6 Q. Do you know whether Walmart
7 reports information to the DEA?

8 A. Yes.

9 Q. Do you know how Walmart reports
10 that information?

11 A. They report it monthly.

12 Q. And who creates the reports?

13 A. It's created through a job in
14 the system, so it's an automatic report that
15 gets put on a server. We take that data and
16 upload it into the DEA's website.

17 Q. And who has the responsibility
18 at Walmart to physically do the uploading of
19 the data?

20 A. There was an individual on our
21 team that did that.

22 Q. And what was that individual's
23 name?

24 A. It was -- when I started on the
25 team, it was Brenda Glenn. Then it was Sarah